



U.S. Department  
of Transportation  
Pipeline and  
Hazardous Material  
Safety Administration

400 Seventh St. S.W.  
Washington, D.C. 20590

## 2006 Natural Gas Program Evaluation Document for Washington Utilities and Transportation Commission

### Document Legend:

#### PART:

- O -- Representative Date and Title Information
- A -- General Program Compliance
- B -- Inspections(Procedures,Records,forms)
- C -- LNG Inspections
- D(1) -- Compliance 60105(a) States
- D(2) -- Compliance 60106(a) States
- D(3) -- Compliance-Interstate Agents
- E -- Incident Investigations
- F -- Field Inspection

2006 Natural Gas Program Evaluation Document -- CY 2006  
(Natural Gas)

State Agency: Washington

Agency Status:

Agency Representative: Dave Lykken

OPS Representative: Tom Finch and Rex Evans

Rating:

60105(a): Yes 60106(a): No Interstate Agent: YES

Date of Visit: 8/13/2007-8/17/2007

Commission Chairman to whom follow up letter is to be sent:

Name/Title: Mr. Mark Sidran, Chairman

Agency: Washington Utilities and Transportation Commission

Address: 1300 Evergreen Park Drive SW

City/State/Zip: Olympia, Washington, 98502

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**INSTRUCTIONS:**

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2006 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the OPS representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Circle the correct answer; then place the score in the points column. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, delete the question and deduct the points from the total possible points. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

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**Field Inspection PART F**

The field inspection form used will allow different areas of emphasis to be considered for each question. Questions 6, 7 and 8 are provided for scoring this portion of the field inspection. In completing PART F, the OPS representative should include a written summary which thoroughly documents the inspection.

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# PART A -General Program Compliance

Points(MAX) Score

<b>A.1</b>	Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification /60106 (a) Agreement? (NOTE: OPS Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parentheses.)	8	7
	a.State Jurisdiction and agent status over gas facilities(1)	<input checked="" type="checkbox"/>	
	b.Total state inspection activity(2)	<input checked="" type="checkbox"/>	
	c.Gas facilities subject to state safety jurisdiction(3)	<input checked="" type="checkbox"/>	
	d.Gas pipeline incidents(4)	<input checked="" type="checkbox"/>	
	e.State compliance actions(5)	<input type="checkbox"/>	
	f.State record maintenance and reporting(6)	<input checked="" type="checkbox"/>	
	g.State employees directly involved in the gas pipeline safety program(7)	<input checked="" type="checkbox"/>	
	h.State compliance with Federal requirements(8)	<input checked="" type="checkbox"/>	

## SLR NOTES:

Attachment 1 and 3 they had 17 master meter operators listed but forgot to add the 2 new master meter operators on Attachment 3. They will contact these two new master meter operators as soon as possible.

e. State Compliance Actions had 35 but should have 56 on intrastate and had 18 but should have been 20 carried over.

<b>A.2</b>	Yes = 1 No = 0 Did the state have an adequate mechanism to track operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000) ?	1	1
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## SLR NOTES:

Yes

<b>A.3</b>	Yes = 3 No = 0 Needs Improvement = 1 Did the state take appropriate follow-up actions related to the operator incident reports?	3	3
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## SLR NOTES:

Yes on both of their incidents in 2006.

<b>A.4</b>	Yes = 5 No = 0 Has the state held TSI seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but TSI could not provide, indicate date of state request for seminar)	5	5
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## SLR NOTES:

Yes on 10/25/05 in SeaTac/Seattle, WA.

<b>A.5</b>	Yes = 2 No = 0 Needs Improvement = 1 Were pipeline safety program files well-organized and kept in a secure, readily accessible location?	2	2
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## SLR NOTES:

Yes

<b>A.6</b>	Yes = 5 No = 0 Needs Improvement = 3 Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of OPS program and regulations?	5	5
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## SLR NOTES:

Yes with Dave Lykken. We suggest that the actual pipeline safety program manager as the program manager spend more time during our annual evaluation so that we can evaluate him to verify that he has adequate knowledge of our program and regulations.

<b>A.7</b>	Yes = 5 No = 0 Needs Improvement = 3 Did the state encourage and promote programs to prevent damage to pipeline facilities as a consequence of demolition, excavation, tunneling, or construction activity?	5	5
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## SLR NOTES:

Yes the same as the liquids. Investigating contract locate companies. Should go after the operator who has the ultimate responsibility. They are responsible for enforcing Part 192. Sweeney attends LEPC meetings.

<b>A.8</b>	Yes = 0 No = 0 Have there been modifications or proposed changes to inspector-staffing levels? If yes, describe. (Information Question)	0	0
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## SLR NOTES:

The same as the liquids.

<b>A.9</b>	Yes = 0 No = 0 What were the major accomplishments for the year being evaluated? Describe the accomplishments. (Information Question)	0	0
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## SLR NOTES:

1. Small Gas Pipeline Study:

Hired consultant to perform a study to identify system characteristics that pose risks warranting a regulatory or policy response, identify the types of small gas systems operating in Washington, and to identify the range of regulatory/policy responses for those systems.

Background:

There are other small gas systems that do not meet the federal master meter definition yet potentially pose a safety hazard. Gas pipeline systems that are publicly-owned or distribute propane gas are currently not inspected or regulated in the same manner as master meter systems. This study is intended to gather information about all small gas pipeline systems with the intention of determining whether any changes are necessary to the state's safety oversight program. This inquiry may inform a future rulemaking and could guide the commission in a request for changes in state law.

2. Public Awareness:

Assisted operators in complying with the new PA rule. Tim Sweeney our Public Outreach Coordinator attended several meetings to brief operators on the requirements of the PA rule.

3. Web Access to pipeline maps (pilot program)

4. Web access to standard and specialized inspection reports

5. One-call enforcement emphases

Seek enforcement against excavators who habitually dig before calling for locates. Currently conducting investigation regarding Third Party locating service not meeting requirement to complete locate requests 2 days prior to scheduled excavation.

A.10

Yes = 0 No = 0

What legislative or program initiatives are taking place/planned in the state, past, present, and future?

0

0

Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)  
(Information Question)

SLR NOTES:

1. Senate Bill 5225 became law on July 22, 2007, the first major revision to Washington's pipeline safety act since 2001. The legislation consolidates all pipeline safety authority under one chapter of law. It clarifies the UTC's authority over pipeline safety and updates state statutes to conform to federal pipeline-safety requirements. The House and Senate passed the bill without any no votes.

In 2007 the UTC will begin rulemaking to conform its rules to the major provisions of the new law:

. Increase maximum penalties for pipeline-safety violations so they are consistent with federal law. The state maximum penalty will increase to \$100,000 for each violation a day from its current \$25,000 level. The penalty change applies to hazardous liquid and gas pipelines operating within the state.

. Define "gas" so that it will extend state pipeline-safety regulation to include hydrogen and acid-gas pipelines.

. Extend state pipeline-safety regulation over publicly owned small pipeline systems called "master meters," that are currently subject to federal pipeline safety rules. An example of a publicly owned master meter system is one owned by a public housing authority where the tenant either pays the agency directly or indirectly for the gas received.

. Allow for state pipeline-safety regulation over propane pipeline-distribution systems regardless of whether propane rates are regulated by the commission.

2. Refer to items under Question A.10 (Major Accomplishment) for Program Initiatives

3. Training opportunities exceed requirements found in State program requirements

A.11

Yes or no response required = 5 No = 0

Did the state respond in writing within 45 days to the requested items in the Chairman's letter following the Region's last program evaluation? (Region representative may allow 15 additional days for documented circumstances)

5

5

SLR NOTES:

Yes they responded on March 16th to our January 31st letter.

A.12

Yes = 5 No = 0

Has each inspector fulfilled the 3 year TSI training requirement? If No, has the state been granted a waiver regarding TSI courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TSI courses, but are in a program which will achieve the completion of all applicable courses within 3 years of employment, or if a waiver has been granted by the Associate Administrator for Pipeline Safety, please answer yes.)

5

5

SLR NOTES:

Lex Vinsel is due to complete his by August of 2009. Also recommend that you switch Al Jones out and their new inspector Stephanie Z. in for the PL00250 class early in 2008.

A.13

Brief Description of Non-TSI training Activities

0

For State Personnel:

For State Personnel

NTSB Courses:

Human Fatigue Factors

Al Jones

Joe Subits

Kuang Chu

Patti Johnson  
Scott Rukke

Cognitive Interviewing Techniques  
Al Jones  
Joe Subsits  
Kuang Chu  
Patti Johnson  
Scott Rukke

Clarion Course:

Integrity Management Programs  
Joe Subsits

For Operators:

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

#### SLR NOTES:

Brief Description of Non-TSI Training Activities

For State Personnel

NTSB Courses:

Human Fatigue Factors  
Al Jones  
Joe Subsits  
Kuang Chu  
Patti Johnson  
Scott Rukke

Cognitive Interviewing Techniques  
Al Jones  
Joe Subsits  
Kuang Chu  
Patti Johnson  
Scott Rukke

Clarion Course:

Integrity Management Programs  
Joe Subsits

#### A.14 Part-A General comments/Regional Observations/Computer Inventory

0

#### SLR NOTES:

Same as for liquids. Their Pipeline Safety Program Manager needs to participate more in our annual evaluations and as other Pipeline Safety Program Managers do be there for the complete evaluation.

Computer Inventory:

Quantity	Description	Year	Make	Model	Serial Number	Federal
1	Dell Processor		Dell		Tag # N67NXD51	TSC#98823
1 set	Speakers	Dell				
1	Samsung Flat Screen Monitor			Samsung	MY19HCHX505286	TSC#98843
1	HP PSC 2410 (All in one printer)			HP	MY41SJ36JF	TSC#98914
1	HP Scanjet Scanner 4600			HP	CN3BMB7638	TSC#98794
1	HP Scanjet Scanner		HP		CN2251606H	TSC#92227

#### A.15 Yes = 2 No = 0 Need Improvement = 1

What actions did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation?

2

2

#### SLR NOTES:

Yes they addressed our three major items and had no major deficiencies in 2005 to correct.

#### A.16 Yes = 1 No = 0

Did the lead inspectors complete all required TSI OQ courses and Computer based training before conduction IMP inspection?

1

1

#### SLR NOTES:

Yes the lead inspectors did complete all required TSI OQ courses and Computer based training before conducting OQ inspections.

#### A.17

Did the lead inspectors complete all required IMP Courses/Seminars and CBT before conducting IMP inspection?

0

0

#### SLR NOTES:

Yes the lead inspectors completed all required IMP Courses/Seminars and CBTs before conducting IMP inspections.

A.18

What is the state doing at present concerning the "Common Ground Study" and Damage Prevention?

0

**SLR NOTES:**

Nothing on CGA. Tim Sweeney doing outreach and attending local LEPC meetings and the WUTC is taking action against operators, excavators and third party locating contractors that violate their damage prevention laws.

Total points scored for this section: 41

Total possible points for this section: 42

**PART B - Inspections(Procedures,Records,forms)**

Points(MAX)      Score

<b>B.1</b>	Yes = 5 No = 0 Needs Improvement = 1-4		
Does the State have a written inspection plan to complete the following ?			
a. Standard Inspections	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5	5
b. IMP Inspections	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Needs Improvement	<input type="checkbox"/>
c. OO Inspections	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Needs Improvement	<input type="checkbox"/>
d. Construction Inspections	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Needs Improvement	<input type="checkbox"/>
e. Other integrity inspections and incident investigations	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Needs Improvement	<input type="checkbox"/>

**SLR NOTES:**

Yes they might want to loosen up on their annually to every other year inspections of Direct Sales Laterals.

<b>B.2</b>	Yes = 2 No = 0 Needs Improvement = 1		
Did the written Procedures for selecting operators adequately address key concerns?			
a. Length of time since last inspection	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	2	2
b. History of Operator/unit and/or location (including leakage, incident and compliance history)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Needs Improvement	<input type="checkbox"/>
c. Type of activity being undertaken by operator (construction etc)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Needs Improvement	<input type="checkbox"/>
d. For large operators, rotation of locations inspected	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Needs Improvement	<input type="checkbox"/>

**SLR NOTES:**

Yes

<b>B.3</b>	Yes = 3 No = 0 Needs Improvement = 1		
Did the state inspect units in accordance with time intervals established in its written procedures?			
		3	1

**SLR NOTES:**

No they did not inspect Direct Sales every year as stated in their procedures manual.

<b>B.4</b>	Yes = 4 No = 0 Needs Improvement = 1-3		
Do state inspection forms cover all code requirements addressed on Federal Inspection forms?			
		4	4

**SLR NOTES:**

Yes ours and the states regulations.

<b>B.5</b>	Yes = 4 No = 0 Needs Improvement = 1-3		
Did state complete all portions of all forms?			
		4	4

**SLR NOTES:**

Missed a NA on 192.491 of the City of Buckley inspection by Kuang Chu. However, that was one small item compared to all the forms and check marks.

<b>B.6</b>	Yes = 2 No = 0		
Did the state initiate appropriate follow-up actions related to Safety Related Condition Reports?			
		2	NA

**SLR NOTES:**

NA none in 2006.

<b>B.7</b>	Yes = 2 No = 0 Needs Improvement = 1		
Did the state adequately review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken?			
		2	2

**SLR NOTES:**

Yes

<b>B.8</b>	Yes = 2 No = 0 Needs Improvement = 1		
Did the state adequately review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: If state accepts guidelines less stringent than the AGA GPTC Appendix G-18, circle needs improvement)			
		2	2

**SLR NOTES:**

Yes

<b>B.9</b>	Yes = 2 No = 0 Needs Improvement = 1		
Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from OPS in response to NTSB recommendation P-00-20 and P-00-21?			
		2	2

**SLR NOTES:**

Yes their inspection of Cardinal FG is an example.

<b>B.10</b>	Yes = 2 No = 0 Needs Improvement = 1		
Did the state review records of previous accident investigations including reported third party damage and leak response to ensure appropriate operator response as required by Part 192.617?			
		2	2

**SLR NOTES:**

Yes it is in the procedures checklist 192.617 and should be in the records checklist.

B.11	Yes = 2 No = 0 Needs Improvement = 1 Has the state reviewed underground directional drilling/boring procedures of each operator and their contractors to determine if they include effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technologies? These procedures should include, but are not limited to, accurately locating underground piping and reviewing the qualifications of personnel performing the work.	2	2
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**SLR NOTES:**

Yes per the Advisory Bulletin it should be on the inspection checklist. Dave will remind his inspectors to ask this.

B.12	Yes = 5 No = 0 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Regional director may adjust points for just cause.) A.Total Inspection Person Days (Attachment 2)=	5	5
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B.Total Inspection Person Days Charged to the program(220 X Number of Inspection person years(Attachment 7)=0

Formula:- Score = A/B = /0 = 0

Rule:- (If score >= .38 then points = 5 else Points = 0.) Thus Points = 0

**SLR NOTES:**

= 571.9/5.33x220=571.9/1272.6=0.45 =Yes

B.13	Yes = 3 No = 0 Needs Improvement = 1 Did the state adequately document sufficient information for probable violations?	3	3
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**SLR NOTES:**

Yes concerning the Weyerhaeuser and Cardinal FG violations.

B.14	Part-B General Comments/Regional Observations	0	
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B.15	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections ?	0	
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**SLR NOTES:**

Yes per my recent check of the OQ database with our John Haddow.

B.16	Did the State submit their replies into Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program ?	0	
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**SLR NOTES:**

Yes per my check of the Gas IMP database with our Peter Katchmar.

B.17	Has the Federal Protocol form been uploaded to the Integrity Management Database(IMDB)?	0	
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**SLR NOTES:**

Yes it has for the WUTC. I need to email Buddy Sheets about the bp liquid OandM review.

B.18	Did the State ask Operators to identify any plastic pipe that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns ?	0	
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**SLR NOTES:**

Yes they ask that per their checklist. PSE - working toward putting them in a replacement program.

Total points scored for this section: 34  
Total possible points for this section: 36



# **PART C -LNG Inspections**

**Points(MAX)      Score**

**C.1**      Yes = 2 No = 0  
Did the state inspect LNG facilities in accordance with time intervals in its written procedures?  
Frequency of LNG inspections: (Please Specify time frame in the Note)

2      NA

## **SLR NOTES:**

Yes they did and do them annually. Williams Gas and PSE.

**C.2**      Yes = 1 No = 0  
Did the state fill out inspection form(s) or checklist(s) covering the design, construction, operation, and maintenance of LNG facilities in sufficient detail?

1      1

## **SLR NOTES:**

Yes on the interstate.

**C.3**      Yes = 3 No = 0 Needs Improvement = 1  
Do inspection records sufficiently document review of OandM plans, Emergency plans, personnel qualification, and training?

3      3

## **SLR NOTES:**

Yes on the interstate inspection.

**C.4**      Yes = 2 No = 0  
Do the inspection records adequately document the discovery and nature of probable violations?

2      2

## **SLR NOTES:**

Yes

**C.5**      Yes = 1 No = 0  
Part C: General Comments/Regional Observations

1      NA

## **SLR NOTES:**

Why is there a point assigned to General Comments/Regional Observations.

**C.6**      Yes = 2 No = 0  
Did the written procedures for selecting LNG operators/units adequately address key concerns ?

a.Length of time since last inspection      Yes ☒ No ☐ Needs Improvement ☐  
b.History of Operator/Unit and/or location(including leakage,incident, and compliance history)      Yes ☒ No ☐ Needs Improvement ☐

## **SLR NOTES:**

They do the 1 interstate and one intrastate inspection annually.

**C.7**      Yes = 3 No = 0 Needs Improvement = 1 or 2  
Does the state utilize Federal Inspection forms ? If the state utilized alternative inspection forms , did the inspection forms cover all code requirements addressed on federal inspection forms ?

3      3

## **SLR NOTES:**

Yes on the interstate and the intrastate forms.

Total points scored for this section:      11

Total possible points for this section:      11

**PARTD(1) - Compliance 60105(a) States****Points(MAX)      Score**

**D(1).1**      Yes = 2 No = 0 Needs Improvement = 1  
Does the state have written procedures or a mechanism identifying the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for States Participating in the Pipeline Safety Program", Chapter 5?

2

2

**SLR NOTES:**

Yes the same as the liquids.

**D(1).2**      Yes = 2 No = 0 Needs Improvement = 1  
Does the state have written procedures or a mechanism for notifying an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program", Chapter 5?

2

2

**SLR NOTES:**

Yes the same as the liquids.

**D(1).3**      Yes = 2 No = 0 Needs Improvement = 1  
Does the state have a written procedure or mechanism for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program", Chapter 5?

2

2

**SLR NOTES:**

Yes the same as the liquids. They do need to look more at carryovers from year to year on attachment 5.

**D(1).4**      Yes = 4 No = 0 Needs Improvement = 1-3  
Did the State issue any compliance actions in the last 3 years?(Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation)

4

4

**SLR NOTES:**

Yes they did issue compliance actions in the last 3 years, i.e., Weyerhaeuser and many others.

**D(1).5**      Yes = 2 No = 0 Needs Improvement = 1  
Did the state follow its written procedures or a mechanism in Question 4 for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program", Chapter 5?

2

2

**SLR NOTES:**

Yes the same as the liquids.

**D(1).6**      Yes = 0 No = 0  
If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (Information Question)

0

NA

**SLR NOTES:**

NA not yet but they may have one with PSE in 2007.

**D(1).7**      Yes = 2 No = 0 Needs Improvement = 1  
Did the state adequately document the resolution of probable violations?

2

2

**SLR NOTES:**

Yes they did with all the inspection folders that we looked at.

**D(1).8**      Yes = 1 No = 0  
Were compliance actions sent to a company officer (manager or board member if municipal/government system)?

1

1

**SLR NOTES:**

Yes to The VP and Mill Manager of Weyerhaeuser for example. They do send to the Manager for Regulatory Compliance. Cascade Natural Gas was to the Senior Director of Engineering and should be sent to a Company Officer with a copy to the Senior Director.

**D(1).9**      Yes = 2 No = 0 Needs Improvement = 1  
Did the compliance proceedings give reasonable due process to all parties?

2

2

**SLR NOTES:**

Yes the same as the liquids.

**D(1).10**      Part D(1): General Comments/Regional Observations

0

Total points scored for this section:

17

Total possible points for this section:

17

**PARTD(2) - Compliance 60106(a) States****Points(MAX)      Score**

<b>D(2).1</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state use an inspection form, approved by the Regional Director, covering applicable regulations in sufficient detail?	2	NA
<b>D(2).2</b>	Yes = 2 No = 0 Needs Improvement = 1 Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan?	2	NA
<b>D(2).3</b>	Yes = 5 No = 0 Needs Improvement = 2 Were any cases referred to OPS for compliance in the last 3 years? (NOTE: OPS representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)	5	NA
<b>D(2).4</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state immediately report to OPS conditions which may pose an imminent safety hazard to the public or to the environment?	2	NA
<b>D(2).5</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state give written notice to OPS within 45 days of all probable violations found?	2	NA
<b>D(2).6</b>	Yes = 5 No = 0 Needs Improvement = 2 Did the state initially submit adequate documentation, on report format approved by Regional Director, to support compliance action by OPS on probable violations?	5	NA
<b>D(2).7</b>	Part D(2): General Comments/Regional Observations	0	

**PARTD(3) - Compliance-Interstate Agents****Points(MAX)      Score**

<b>D(3).1</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state use an inspection form, approved by the Regional Director, covering applicable regulations in sufficient detail in accordance with the interstate agent agreement?	2	2
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**SLR NOTES:**

Yes

<b>D(3).2</b>	Yes = 2 No = 0 Needs Improvement = 1 Are results adequately documented demonstrating inspection units were reviewed in accordance with "OPS directed inspection plan"?	2	2
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**SLR NOTES:**

Yes per our Interstate Agent Inspection Work Plan.

<b>D(3).3</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state submit documentation of the inspections within 45 days as stated in its latest Interstate Agent Agreement form?	2	2
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**SLR NOTES:**

Yes they did even after waiting on the documentation from an operator.

<b>D(3).4</b>	Yes = 5 No = 0 Needs Improvement = 2 Were any cases referred to OPS for compliance in the last 3 years? (NOTE: OPS representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)	5	5
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**SLR NOTES:**

Yes in many cases.

<b>D(3).5</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state immediately report to OPS conditions which may pose an imminent safety hazard to the public or to the environment?	2	2
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**SLR NOTES:**

Yes especially the Spokane Williams release.

<b>D(3).6</b>	Yes = 2 No = 0 Needs Improvement = 1 Did the state give written notice to OPS within 45 days of all probable violations found?	2	2
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**SLR NOTES:**

Yes they did.

<b>D(3).7</b>	Yes = 5 No = 0 Needs Improvement = 2 Did the state initially submit adequate documentation, on report format approved by Regional Director, to support compliance action by OPS on probable violations?	5	5
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**SLR NOTES:**

Yes

<b>D(3).8</b>	Part D(3): General Comments/Regional Observations	0	
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**SLR NOTES:**

The WUTC does a good job as an Interstate Agent.

Total points scored for this section:	20
Total possible points for this section:	20

**PART E - Incident Investigations****Points(MAX)      Score**

- E.1**      Yes = 2 No = 0 Needs Improvement = 1  
Are state personnel following the procedures for Federal/State cooperation in case of an incident  
(Appendix C in "Guidelines for States Participating in the Pipeline Safety Program")?

2      2

**SLR NOTES:**

Of the 2 incidents one was rock impingement, and the other was a bad weld so no no violations.

- E.2**      Yes = 2 No = 0 Needs Improvement = 1  
Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding  
(Appendix B in "Guidelines for States Participating in the Pipeline Safety Program") between NTSB and  
OPS?

2      2

**SLR NOTES:**

Yes I asked Kuang Chu and he answered correctly.

- E.3**      Yes = 2 No = 0 Needs Improvement = 1  
Did the state keep adequate records of incident notifications received?

2      2

**SLR NOTES:**

Yes for Williams Gas's 2 incidents.

- E.4**      Yes = 2 No = 0 Needs Improvement = 1  
If an onsite investigation of an incident was not made, did the state obtain sufficient information by  
other means to determine the facts and support the decision not to go on-site?

2      NA

**SLR NOTES:**

NA both incidents were investigated.

- E.5**      Yes = 5 No = 0 Needs Improvement = 2  
Were investigations thorough and conclusions and recommendations documented in an acceptable  
manner?

5      5

- a. Observations ..... Yes ☒ No ☐ Needs Improvement ☐  
b. Contributing factors ..... Yes ☒ No ☐ Needs Improvement ☐  
c. Recommendations to prevent recurrences where appropriate ..... Yes ☒ No ☐ Needs Improvement ☐

**SLR NOTES:**

Yes

- E.6**      Yes = 3 No = 0 Needs Improvement = 1  
Did the state follow-up on any violations found during an incident investigation?

3      NA

**SLR NOTES:**

NA no violations.

- E.7**      Part E: General Comments/Regional Observations

0

**SLR NOTES:**

Do a good job working with PHMSA concerning incidents.

- E.8**      Yes = 0 No = 0 Needs Improvement = 0  
Did the state take appropriate follow-up actions related to Operator incident reports ?

0      0

**SLR NOTES:**

Yes they followed up in an acceptable manner.

- E.9**      Yes = 0 No = 0 Needs Improvement = 0  
Did the state work with PHMSA to ensure that incident/accident reports are accurate and updated?

0      0

**SLR NOTES:**

Yes.

Total points scored for this section: 11

Total possible points for this section: 11

# PART F -Field Inspection

Points(MAX) Score

**F.1** Operator,Inspector,Location,Date,OPS Representative Information  
 Name of Operator Inspected:  
 BP Pipelines (North America), Inc.  
 Name of State Inspector(s) Observed:  
 Joe Subits  
 Location of Inspection:  
 Ferndale, WA  
 Date of Inspection:  
 August 27 - 31, 2007  
 Name of Operator Inspected:  
 Jerry Kenerson

0

## SLR NOTES:

The Ferndale (gas) pipeline systems was inspected.

**F.2** Yes = 2 No = 0  
 Did the inspector use an acceptable inspection form/checklist?

2

2

## SLR NOTES:

The inspector used the Standard Inspection Checklist (with WUTC supplemental requirements), 2007 Edition.

**F.3** Yes = 2 No = 0  
 Did the inspector thoroughly document results of the inspection?

2

2

## SLR NOTES:

Thorough documentation was completed by the inspector.

**F.4** Yes = 1 No = 0  
 Is the inspector using the inspection form/checklist as a guide for the inspection?

1

1

## SLR NOTES:

The inspector used the inspection checklist as a guide throughout the entire inspection process.

**F.5** Yes = 1 No = 0  
 Has the state incorporated new regulations into the inspection form/checklist?

1

1

## SLR NOTES:

WUTC has incorporated a large number of supplemental (State) regulations to the Federal Standard Inspection Checklist.

**F.6** Yes = 2 No = 0 Needs Improvement = 1  
 Did the inspector check to assure the operator is following its written procedures for (check all that apply):

2

2

- a..Abandonment ☒
- b..Abnormal Operations ☒
- c..Break-Out Tanks ☐
- d..Compressor or Pump Stations ☐
- e..Change in Class Location ☒
- f..Casings ☒
- g..Cathodic Protection ☒
- h..Cast Iron Replacement ☐
- i..Damage Prevention ☒
- j..Deactivation ☒
- k..Emergency Procedures ☒
- l..Inspection of Right-of-Way ☒
- m..Line Markers ☒
- n..Liaison with Public Officials ☒
- o..Leak Surveys ☒
- p..MOP ☐
- q..MAOP ☒
- r..Moving Pipe ☒
- s..New Construction ☒
- t..Navigable Waterway Crossings ☐
- u..Odorization ☒
- v..Overpressure Safety Devices ☒
- w..Plastic Pipe Installation ☒

x..Public Education	<input checked="" type="checkbox"/>
y..Purging	<input checked="" type="checkbox"/>
z..Prevention of Accidental Ignitions	<input checked="" type="checkbox"/>
A..Repairs	<input checked="" type="checkbox"/>
B..Signs	<input checked="" type="checkbox"/>
C..Tapping	<input checked="" type="checkbox"/>
D..Valve Maintenance	<input checked="" type="checkbox"/>
E..Vault Maintenance	<input type="checkbox"/>
F..Welding	<input checked="" type="checkbox"/>

#### SLR NOTES:

Items not checked are not applicable to the operator's operation.

<b>F.7</b>	Yes = 2 No = 0 Needs Improvement = 1		
	Did the inspector assure the operator's procedures are adequate for (check all that apply):	2	2
a..Abandonment	<input checked="" type="checkbox"/>		
b..Abnormal Operations	<input checked="" type="checkbox"/>		
c..Break-Out Tanks	<input type="checkbox"/>		
d..Compressor or Pump Stations	<input type="checkbox"/>		
e..Change in Class Location	<input checked="" type="checkbox"/>		
f..Casings	<input checked="" type="checkbox"/>		
g..Cathodic Protection	<input checked="" type="checkbox"/>		
h..Cast Iron Replacement	<input type="checkbox"/>		
i..Damage Prevention	<input checked="" type="checkbox"/>		
j..Deactivation	<input checked="" type="checkbox"/>		
k..Emergency Procedures	<input checked="" type="checkbox"/>		
l..Inspection of Right-of-Way	<input checked="" type="checkbox"/>		
m..Line Markers	<input checked="" type="checkbox"/>		
n..Liaison with Public Officials	<input checked="" type="checkbox"/>		
o..Leak Surveys	<input checked="" type="checkbox"/>		
p..MOP	<input type="checkbox"/>		
q..MAOP	<input checked="" type="checkbox"/>		
r..Moving Pipe	<input checked="" type="checkbox"/>		
s..New Construction	<input checked="" type="checkbox"/>		
t..Navigable Waterway Crossings	<input type="checkbox"/>		
u..Odorization	<input checked="" type="checkbox"/>		
v..Overpressure Safety Devices	<input checked="" type="checkbox"/>		
w..Plastic Pipe Installation	<input type="checkbox"/>		
x..Public Education	<input checked="" type="checkbox"/>		
y..Purging	<input checked="" type="checkbox"/>		
z..Prevention of Accidental Ignitions	<input checked="" type="checkbox"/>		
A..Repairs	<input checked="" type="checkbox"/>		
B..Signs	<input checked="" type="checkbox"/>		
C..Tapping	<input checked="" type="checkbox"/>		
D..Valve Maintenance	<input checked="" type="checkbox"/>		
E..Vault Maintenance	<input type="checkbox"/>		
F..Welding	<input checked="" type="checkbox"/>		

#### SLR NOTES:

Items not checked are not applicable to operations, and are not covered in the operator's O and M.

<b>F.8</b>	Yes = 2 No = 0 Needs Improvement = 1		
	Did the inspector check to assure the operator's records verify code and procedures are followed (check all that apply):	2	2
a..Abandonment	<input checked="" type="checkbox"/>		
b..Abnormal Operations	<input checked="" type="checkbox"/>		
c..Break-Out Tanks	<input type="checkbox"/>		
d..Compressor or Pump Stations	<input type="checkbox"/>		
e..Change in Class Location	<input checked="" type="checkbox"/>		
f..Casings	<input checked="" type="checkbox"/>		

g. Cathodic Protection	<input checked="" type="checkbox"/>
h. Cast Iron Replacement	<input type="checkbox"/>
i. Damage Prevention	<input checked="" type="checkbox"/>
j. Deactivation	<input checked="" type="checkbox"/>
k. Emergency Procedures	<input checked="" type="checkbox"/>
l. Inspection of Right-of-Way	<input checked="" type="checkbox"/>
m. Line Markers	<input checked="" type="checkbox"/>
n. Liaison with Public Officials	<input checked="" type="checkbox"/>
o. Leak Surveys	<input checked="" type="checkbox"/>
p. MOP	<input type="checkbox"/>
q. MAOP	<input checked="" type="checkbox"/>
r. Moving Pipe	<input checked="" type="checkbox"/>
s. New Construction	<input checked="" type="checkbox"/>
t. Navigable Waterway Crossings	<input type="checkbox"/>
u. Odorization	<input checked="" type="checkbox"/>
v. Overpressure Safety Devices	<input checked="" type="checkbox"/>
w. Plastic Pipe Installation	<input type="checkbox"/>
x. Public Education	<input checked="" type="checkbox"/>
y. Purging	<input checked="" type="checkbox"/>
z. Prevention of Accidental Ignitions	<input checked="" type="checkbox"/>
A. Repairs	<input checked="" type="checkbox"/>
B. Signs	<input checked="" type="checkbox"/>
C. Tapping	<input checked="" type="checkbox"/>
D. Valve Maintenance	<input checked="" type="checkbox"/>
E. Vault Maintenance	<input type="checkbox"/>
F. Welding	<input checked="" type="checkbox"/>

#### SLR NOTES:

Items not checked are not applicable to this operator.

F.9	Yes = 2 No = 0 Did the inspector have adequate knowledge of the pipeline safety program goals and regulations?	2	2
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#### SLR NOTES:

The inspector's demonstrated a superior knowledge of the pipeline safety program goals and regulations is superior.

F.10	Yes = 0 No = 0 What is the inspector observing in the field? Review the summary.	0	0
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#### SLR NOTES:

The inspector's areas of focus in the field were general, but comprehensive. He showed special interest in operator qualification (OQ) performance, regulator compliance, acceptable cathodic protection readings (especially at riser locations), valve condition, assurance that pre-tested pipe was marked in compliance with Code requirements, atmospheric oxidation, and station security.

F.11	Yes = 1 No = 0 Did the inspector conduct an exit interview?	1	1
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#### SLR NOTES:

The exit interview emphasized O and M procedures that need to be revised or clarified, and records that were incomplete or missing.

F.12	Yes = 1 No = 0 During the exit interview, did the inspector identify probable violations found during the inspection?	1	1
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#### SLR NOTES:

The inspector identified the following probable procedure/record violations found during the inspection: Missing 2006 Odorant records; WAC 480 - 93 - Use of calibrated equipment for leak surveys; Pipeline exposure reports; and, maintaining liaison with public officials.

F.13	Part F: Summary of Comments (written Summary Required; Attach additional sheets as necessary)	0	
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#### SLR NOTES:

The inspector was thorough in an examination of the operator's records to support it's pipeline safety program. During the inspection, the inspector consistently compared documented records to the operator's O and M procedures as appropriate. The field audit was methodical and comprehensive, focusing on regulator operations, cathodic protection, and Operator Qualification. Mr. Subits is one of the most thorough and inquisitive field inspectors that I have ever observed. He methodically checks the operational details of facility operational systems. Eight individual field sites were inspected, including primary and satellite sites. These were evenly spread within and around the city of Ferndale, as well as several remote sites. Special attention was given to cathodic protection and regulator set points versus actual operating pressure. Areas of concerns included missing odorant records for 2006, use of calibrate equipment for leak surveys per requirements of WAC 480-93, missing pipeline exposure reports, and inadequate procedures for liaison with public officials. In addition, the inspector held a firm knowledge of Federal and State Code requirements, and showed courtesy in response to queries from the operator during the inspection process.

Total points scored for this section:	16
Total possible points for this section:	16



Rating

Washington

Program Type: 60105

PART		Possible Points	Points Scored
O	Representative Date and Title Information		
A	General Program Compliance	42	41
B	Inspections(Procedures,Records,forms)	36	34
C	LNG Inspections	11	11
D(1)	Compliance 60105(a) States	17	17
D(2)	Compliance 60106(a) States		
D(3)	Compliance-Interstate Agents	20	20
E	Incident Investigations	11	11
F	Field Inspection	16	16
TOTAL		153	150
State Rating			98

Program Evaluation SLR Comments

